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Via ECF

The Honorable Sarah Netburn
United States Magistrate Judge
40 Foley Square, Room 430
New York, NY 10007

Re: *Roche Freedman LLP v. Jason Cyrulnik*, No. 1:21-cv-1746 (S.D.N.Y.)

Dear Judge Netburn:

We write on behalf of Plaintiff Roche Freedman LLP and Counterclaim-Defendants Devin Freedman, Amos Friedland, and Edward Normand (the “RF Parties”), to object to Defendant Jason Cyrulnik’s response to the RF Parties’ opposition to his motion for reconsideration. (Dkt. 309).

The RF Parties believe this issue has been adequately briefed, and write now only to assure the Court that (contrary to the insinuations in Cyrulnik’s reply) they are not aware of any responsive materials that have not been produced and that there is no “discovery gamesmanship” at play. As mentioned previously, the vast majority of the Firm’s contingency cases have not been funded and have not reached expert discovery. Cyrulnik litigated search terms and document requests extensively in this case and had ample opportunity to investigate the valuation of the Firm’s cases during fact discovery.

Respectfully,

/s/ Jonathan Bach

Jonathan Bach

cc: Counsel of Record (via ECF)